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SECRET WATERFALL LLC,
7 LAUNCELOT A. DEVAULT, AND
TARAH A. UHRICH

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION
11

12 RAINBOW S.p.A.,
13 Plaintiff,

14 v.

15 SECRET WATERFALL LLC,
16 LAUNCELOT A. DEVAULT,
17 TARAH A. UHRICH, STARLINE
MEDIA, INC., AND DAVID
NDALAMBA,

18 Defendant.
19

Case No. 5:25-0597-MRA(DTBx)

**DEFENDANTS' STATEMENT
REGARDING PLAINTIFF'S
MOTION FOR LEAVE TO AMEND
COMPLAINT**

Judge: Hon. Monica Ramirez Almadani
Crtrm.: 10B

1 Defendants Secret Waterfall LLC, Launcelot A. Devault and Tarah Uhrich
2 (collectively “Defendants”) hereby submit the following statement regarding
3 Plaintiff’s Motion for Leave to Amend Complaint.

4 Defendants do not, in principle, oppose Plaintiff’s motion for leave to file a
5 Second Amended Complaint. Dkt. 17. In filing this statement, Defendants do not
6 waive any defense, or their right to challenge the sufficiency of the pleadings
7 themselves.

8 Plaintiff’s proposed Second Amended Complaint, however, contains over
9 1,400 paragraphs, and is 371 pages long. Dkt. 17-1. The proposed Second Amended
10 Complaint contains 75 counts, including 69 counts of copyright infringement
11 relating to separate copyrights. *Id.* In view of the number of counts and copyrights at
12 issue, Defendants respectfully request forty-five days to respond to Plaintiff’s
13 Second Amended Complaint.

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16 Dated: July 7, 2025

BERGESON LLP

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19 By: /s/ Jaideep Venkatesen
Jaideep Venkatesan

20 Attorneys for Defendants
21 SECRET WATERFALL LLC,
22 LAUNCELOT A. DEVAULT, AND TARAH
23 A. UHRICH
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